

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ADVANCE CELLULAR SYSTEMS, INC.

Plaintiff

v.

Civil No. 97-2511 (JAF)

PUERTO RICO TELEPHONE COMPANY,
Inc.

Defendant

MOTION FOR LEAVE TO REPLY

TO THE HONORABLE COURT:

COMES NOW, the defendant Puerto Rico Telephone Company (D/B/A Verizon Wireless), through its undersigned counsel, requests as follows:

PRTC moves for leave to file a brief reply to plaintiff's Supplemental Memorandum (Doc. No. 55), filed on March 5, 2007 on grounds that plaintiff ACS makes new arguments about the scope of the automatic stay of PRTC's counterclaim and the finality of the Judgment that should be addressed for this court to have a complete record to resolve the jurisdictional issue. To expedite the proceedings, PRTC has tendered a four-page Reply Memorandum.

WHEREFORE, the court should allow defendant PRTC leave to reply for good cause shown and file the Reply Memorandum tendered with this motion.

Respectfully Submitted.

In San Juan, Puerto Rico, this 9th day of March 2007.

CERTIFICATION: Today we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to plaintiff's counsel Zuleika Llovett and Jairo Mellado, Esq.

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